

EXHIBIT A

Joint Claim Construction Chart Pursuant to LPR 1-15(b)

U.S. Patent No. 9,993,222		
Term/Phrase of the '222 Patent Proposed for Construction	Plaintiff GLOCK, Inc.'s Proposed Construction and Disclosed Intrinsic/Extrinsic Evidence	Defendant Polymer80, Inc.'s Proposed Construction and Disclosed Intrinsic/Extrinsic Evidence
Term/Phrase Proposed for Construction by the Parties		
<p>"lower claw"</p> <p>(Claims 1-3)</p>	<p>"Lower end region of the spring end of the holding lever"</p> <p><u>Intrinsic evidence:</u></p> <p>'222 Patent, 3:10-14, 15-24, 38-46, 50-54; 4:5-7, 15-20, 20-25</p> <p>'222 Patent, Claims 1-3</p> <p><u>Extrinsic evidence:</u></p> <p><i>lower</i></p> <ul style="list-style-type: none"> • "in a place or on a level below another" <ul style="list-style-type: none"> ▪ <i>Webster's New World Dictionary</i>, 802 (3rd ed. 1988) • "the bottom one of a pair of things" <ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/lower (Oct. 30, 2023) <p><i>claw</i></p>	<p>"A curved extension from the lower end region of the holding lever directed toward the upper claw to securely hold the compression spring in a compressed state."</p> <p><i>Prosecution History</i></p> <p>See Patent file Bates 273 ("In contrast, the pistol of the present application incorporates an improved catch device that includes a spring that is retained by the catch device itself. The compression spring is retained between an upper claw and a lower claw formed at the end of a holding lever, such that the upper and lower claws are directed towards each other." "The compression spring is both easier to mount and more difficult to lose, as the spring can be installed between the claws prior to the installation of the catch device in the body of the pistol.")</p> <p><i>Patent specification</i></p> <p>See 222 Patent at 3:18-20.</p> <p><i>Extrinsic Evidence</i></p>

	<ul style="list-style-type: none"> “anything resembling or regarded as a claw” <ul style="list-style-type: none"> <i>Webster’s New World Dictionary</i>, 259 (3rd ed. 1988) “something that resembles a claw” <ul style="list-style-type: none"> <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/claw (Oct. 30, 2023) “any part of thing resembling a claw” <ul style="list-style-type: none"> <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/claw (Oct. 30, 2023) 	<p><i>See Merriam-Webster</i>: “a sharp usually slender and curved nail on the toe of an animal: any of various sharp curved processes especially at the end of a limb (as of an insect) also: a limb ending in such a process: one of the pincerlike organs terminating some limbs of various arthropods (such as a lobster or scorpion): something that resembles a claw.” <i>See Cambridge Dictionary</i>: “an object or tool for picking things up that looks something like the claws of an animal, bird, or insect:”</p>
Term/Phrase Proposed for Construction by Plaintiff GLOCK, Inc.		
“retained by” (Claim 2)	“Held secure or kept by” <u>Intrinsic evidence</u> : ‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10 ‘222 Patent, Claim 2 <u>Extrinsic evidence</u> : <i>retained</i> <ul style="list-style-type: none"> “held” or “kept” <ul style="list-style-type: none"> <i>Webster’s New World Dictionary</i>, 1145 (3rd ed. 1988) “held secure or intact” <ul style="list-style-type: none"> <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/retain (Oct. 30, 2023) 	“Securely held such that the spring is difficult to lose.” <i>Prosecution History</i> Bates 186 (“Because the compression spring of the claimed holding lever is pretensioned between the upper and lower claws of the holding lever, the spring may be placed on the holding lever where it is retained securely”.); Bates 273 (“The compression spring is both easier to mount and more difficult to lose, as the spring can be installed between the claws prior to the installation of the catch device in the body of the pistol.”); Bates 273 (“Furthermore, when the pretensioned compression spring is tensioned further (as during use), there is virtually no relative movement between the ends of the spring and adjacent components.”) <i>Extrinsic Evidence</i> Merriam-webster (“to hold secure or intact”).

Term/Phrase Proposed for Construction by Defendant Polymer80, Inc.		
<p>“pistol” (Claims 1-4)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms.</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 8</p> <p>‘222, 1:4-10; 2:61-3:3; 3:38-41; 4:12</p> <p>‘222 Patent, Claims 1-4</p> <p><u>Extrinsic evidence:</u></p> <p>U.S. Patent No. 3,109,345</p> <p>U.S. Patent No. 4,825,744</p> <p>U.S. Patent No. 4,893,546</p> <p>U.S. Patent No. 4,539,889</p> <p><i>pistol</i></p> <ul style="list-style-type: none"> • “a small firearm made to be held and fired with one hand” • <i>Webster’s New World Dictionary</i>, 1029 (3rd ed. 1988) 	<p>"An assembled pistol containing all parts necessary for it to function."</p> <p><u>Extrinsic evidence:</u></p> <p>U.S. Patent No. 4,825,744</p>

<p>“upper claw” (Claims 1-3)</p>	<p>GLOCK contends that this phrase need not be construed by the Comt and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms.</p> <p>In the event and/or to the extent the Comt determines that this phrase should be construed, GLOCK contends that the plain and ordinary meaning of the phrase as understood by one of ordinary skill in the art is:</p> <p>“Upper end region of the spring end of the holding lever”</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 5, 6, 7, 10</p> <p>‘222 Patent, 4:20-25</p> <p>‘222 Patent, Claims 1-3</p> <p><u>Extrinsic evidence:</u></p> <p><i>upper</i></p> <ul style="list-style-type: none"> • “in a place or on a level above another” • <i>Webster’s New World Dictionary</i>, 1466 (3rd ed. 1988) <p><i>claw</i></p> <ul style="list-style-type: none"> • “anything resembling or regarded as a claw” <ul style="list-style-type: none"> ▪ <i>Webster’s New World Dictionary</i>, 259 (3rd ed. 1988) • “something that resembles a claw” <ul style="list-style-type: none"> ▪ <i>Merriam-Webster.com Dictionary</i>, https://www.merriamwebster.com/dictionary/claw (Oct. 30, 2023) 	<p>“A curved extension from an upper end region of the holding lever directed toward the lower claw to securely hold the compression spring in a compressed state.”</p> <p><i>Patent History</i></p> <p><i>See</i> Patent file Bates 273 (“In contrast, the pistol of the present application incorporates an improved catch device that includes a spring that is retained by the catch device itself. The compression spring is retained between an upper claw and a lower claw formed at the end of a holding lever, such that the upper and lower claws are directed towards each other.” “The compression spring is both easier to mount and more difficult to lose, as the spring can be installed between the claws prior to the installation of the catch device in the body of the pistol.”)</p> <p><i>Patent Specification</i></p> <p><i>See</i> 222 Patent at 3:18-20.</p> <p><i>Extrinsic Evidence</i></p> <p><i>See</i> Merriam-Webster: “a sharp usually slender and curved nail on the toe of an animal: any of various sharp curved processes especially at the end of a limb (as of an insect) also: a limb ending in such a process: one of the pincerlike organs terminating some limbs of various arthropods (such as a lobster or scorpion): something that resembles a claw.” <i>See</i> Cambridge Dictionary: “an object or tool for picking things up that looks something like the claws of an animal, bird, or insect:”</p>
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	<ul style="list-style-type: none"> • “any part of thing resembling a claw” <ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/claw (Oct. 30, 2023) 	
“compression spring” (Claims 1-3)	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms.</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 3:15-17, 20-25, 41-49, 50-53; 4:20-25</p> <p>‘222 Patent, Claims 1-3</p> <p><u>Extrinsic evidence:</u></p> <p><i>compression</i></p> <ul style="list-style-type: none"> • “made more compact by pressure” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) <p><i>spring</i></p> <ul style="list-style-type: none"> • “a device, as a coil of wire, that returns to its original form after being forced out of shape; springs are used to absorb shock, and as the motive power in clocks and other similar mechanisms” • <i>Webster’s New World Dictionary</i>, 1298 (3rd ed. 1988) 	<p>"A coil spring formed from a piece of material wound around itself in a helix shape that allows the spring to resist compressive forces."</p> <p><i>Prosecution History</i></p> <p>Only a coil spring is disclosed in the ‘222 Patent and the compression spring must extend sideways from the holder to “bear[s] at its lower end against a base of a slot in the pistol housing.” <i>See</i> Bates 273.</p>

<p>“pretensioned” (Claims 1-2)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms, in view of the plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms attributed to the claim terms “compression spring” and “pretensioned” as referenced above.</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 2:34-37, 41-45; 3:15-17, 20-24; 4:20-25</p> <p>‘222 Patent, Claims 1-2</p> <p><u>Extrinsic evidence:</u></p> <p><i>pretension</i></p> <ul style="list-style-type: none"> • “apply tension to (an object) during manufacture or prior to some other process” • <i>Oxford English Dictionary</i>, https://www.oed.com/search/dictionary/?scope=Entries&q=pretension (Oxford University Press, Oct. 30, 2023) <p><i>tension</i></p> <ul style="list-style-type: none"> • “stress on a material produced by the pull of forces tending to cause extension” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) 	<p>“The spring is compressed by an external force such that a compressed length of the spring is less than a relaxed length of the spring.”</p> <p><i>Prosecution History</i></p> <p><i>See Bates 273.</i></p>
<p>“pretensioned compression spring” (Claims 1-2)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms, in view of the plain and</p>	<p>“The spring is compressed such that a relaxed length of the spring is greater than a distance between the upper and lower claws.</p>

	<p>ordinary meaning as understood by one of ordinary skill in the art of pistol firearms attributed to the claim terms “compression spring” and “pretensioned” as referenced above.</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 2:34-37, 41-45; 3:15-17, 20-25, 41-49, 50-53; 4:20-25</p> <p>‘222 Patent, Claims 1-3</p> <p><u>Extrinsic evidence:</u></p> <p><i>pretension</i></p> <ul style="list-style-type: none"> • “apply tension to (an object) during manufacture or prior to some other process” • <i>Oxford English Dictionary</i>, https://www.oed.com/search/dictionary/?scope=Entries&q=pretension (Oxford University Press, Oct. 30, 2023) <p><i>tension</i></p> <ul style="list-style-type: none"> • “stress on a material produced by the pull of forces tending to cause extension” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) <p><i>compression</i></p> <ul style="list-style-type: none"> • “made more compact by pressure” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) 	<p><i>Prosecution History</i></p> <p><i>See Bates 273.</i></p>
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	<p><i>spring</i></p> <ul style="list-style-type: none"> “a device, as a coil of wire, that returns to its original form after being forced out of shape; springs are used to absorb shock, and as the motive power in clocks and other similar mechanisms” <i>Webster’s New World Dictionary</i>, 1298 (3rd ed. 1988) 	
<p>“pretensioned between the upper claw and the lower claw”</p> <p>(Claims 1-2)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms in view of the plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms attributed to the claim terms “compression spring,” “pretensioned,” and “upper claw” as referenced above, in conjunction with the Court’s construction of “lower claw.”</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 2:34-37, 41-45; 3:15-17, 20-24; 4:20-25</p> <p>‘222 Patent, Claims 1-2</p> <p><u>Extrinsic evidence:</u></p> <p><i>pretension</i></p> <ul style="list-style-type: none"> “apply tension to (an object) during manufacture or prior to some other process” <i>Oxford English Dictionary</i>, 	<p>“The spring is compressed such that a relaxed length of the spring is greater than a distance between the upper and lower claws.</p> <p><i>Prosecution History</i></p> <p><i>See Bates 273</i></p>

	<p>https://www.oed.com/search/dictionary/?scope=Entries&q=pretension (Oxford University Press, Oct. 30, 2023)</p> <p><i>tension</i></p> <ul style="list-style-type: none"> • “stress on a material produced by the pull of forces tending to cause extension” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) <p><i>between</i></p> <ul style="list-style-type: none"> • “in the space separating (two points, objects, etc.)” • <i>Random House Webster’s Unabridged Dictionary 200</i> (2d ed 1998) <p><i>upper</i></p> <ul style="list-style-type: none"> • “in a place or on a level above another” • <i>Webster’s New World Dictionary</i>, 1466 (3rd ed. 1988) <p><i>lower</i></p> <ul style="list-style-type: none"> • “in a place or on a level below another” <ul style="list-style-type: none"> ▪ <i>Webster’s New World Dictionary</i>, 802 (3rd ed. 1988) • “the bottom one of a pair of things” <ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/lower (Oct. 30, 2023) <p><i>claw</i></p> <ul style="list-style-type: none"> • “anything resembling or regarded as a claw” 	
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	<ul style="list-style-type: none"> ▪ <i>Webster's New World Dictionary</i>, 259 (3rd ed. 1988) • “something that resembles a claw” <ul style="list-style-type: none"> ▪ <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/claw (Oct. 30, 2023) • “any part of thing resembling a claw” <ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/claw (Oct. 30, 2023) 	
<p>“a pretensioned compression spring disposed between and retained by the upper and lower opposed claws”</p> <p>(Claims 1-2)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms, in view of the plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms attributed to the claim terms “compression spring,” “pretensioned,” and “lower claw” as referenced above, in conjunction with the Court’s construction of “lower claw” and “retained.”</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 2:34-37, 41-45; 3:15-17, 20-25, 41-49, 50-53; 4:20-25</p> <p>‘222 Patent, Claims 1-3</p> <p><u>Extrinsic evidence:</u></p> <p><i>pretension</i></p>	<p>"A compression spring which is securely held in place by an upper claw directed toward an identical opposing lower claw and pretensioned achieved by a relaxed length of the spring that is greater than the distance between the upper and lower claws."</p> <p><i>Prosecution History</i> <i>See Bates 273.</i></p>

	<ul style="list-style-type: none"> • “apply tension to (an object) during manufacture or prior to some other process” • <i>Oxford English Dictionary</i>, https://www.oed.com/search/dictionary/?scope=Entries&q=pretension (Oxford University Press, Oct. 30, 2023). <p><i>tension</i></p> <ul style="list-style-type: none"> • “stress on a material produced by the pull of forces tending to cause extension” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) <p><i>compression</i></p> <ul style="list-style-type: none"> • “made more compact by pressure” • <i>Webster’s New World Dictionary</i>, 286 (3rd ed. 1988) <p><i>spring</i></p> <ul style="list-style-type: none"> • “a device, as a coil of wire, that returns to its original form after being forced out of shape; springs are used to absorb shock, and as the motive power in clocks and other similar mechanisms” • <i>Webster’s New World Dictionary</i>, 1298 (3rd ed. 1988) <p><i>disposed</i></p> <ul style="list-style-type: none"> • “put in place” • <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/dispensed (Oct. 30, 2023) 	
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	<ul style="list-style-type: none"> • “placed at proper distances apart and in proper positions with regard to each other, to place suitably” • <i>Oxford English Dictionary</i>, https://www.oed.com/search/dictionary/?scope=Entries&q=disposed (Oxford University Press, Oct. 30, 2023) <p><i>retained</i></p> <ul style="list-style-type: none"> • “held” or “kept” <ul style="list-style-type: none"> ▪ <i>Webster’s New World Dictionary</i>, 1145 (3rd ed. 1988) • “held secure or intact” <ul style="list-style-type: none"> ▪ <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/retain (Oct. 30, 2023) <p><i>between</i></p> <ul style="list-style-type: none"> • “in the space separating (two points, objects, etc.)” • <i>Random House Webster’s Unabridged Dictionary</i> 200 (2d ed 1998) <p><i>upper</i></p> <ul style="list-style-type: none"> • “in a place or on a level above another” • <i>Webster’s New World Dictionary</i>, 1466 (3rd ed. 1988) <p><i>lower</i></p> <ul style="list-style-type: none"> • “in a place or on a level below another” <ul style="list-style-type: none"> ▪ <i>Webster’s New World Dictionary</i>, 802 (3rd ed. 1988) • “the bottom one of a pair of things” 	
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	<ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/lower (Oct. 30, 2023) <p><i>claw</i></p> <ul style="list-style-type: none"> • “anything resembling or regarded as a claw” <ul style="list-style-type: none"> ▪ <i>Webster’s New World Dictionary</i>, 259 (3rd ed. 1988) • “something that resembles a claw” <ul style="list-style-type: none"> ▪ <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/claw (Oct. 30, 2023) • “any part of thing resembling a claw” <ul style="list-style-type: none"> ▪ <i>Collins Dictionary</i>, https://www.collinsdictionary.com/dictionary/english/claw (Oct. 30, 2023) 	
<p>“holding extensions” (Claim 3)</p>	<p>GLOCK contends that this phrase need not be construed by the Court and should, instead, be afforded its plain and ordinary meaning as understood by one of ordinary skill in the art of pistol firearms.</p> <p><u>Intrinsic evidence:</u></p> <p>‘222 Patent, FIG. 4, 5, 6, 7, 8, 9, 10</p> <p>‘222 Patent, 2: 34-36, 63-65; 3:4-9, 18-24; 4:20-25</p> <p>‘222 Patent, Claims 1-4</p> <p><u>Extrinsic evidence:</u></p> <p><i>holding</i></p>	<p>"protrusions from the upper claw and an identical opposing lower claw which extends into a pretensioned compression spring to securely hold the spring in place."</p> <p><i>Prosecution History</i></p> <p>See Bates 273 and specifications in '222 patent</p>

	<ul style="list-style-type: none">• “something that holds”• <i>Merriam-Webster.com Dictionary</i>, https://www.merriam-webster.com/dictionary/holding (Oct. 30, 2023) <p><i>extension</i></p> <ul style="list-style-type: none">• “a part constituting an addition”• <i>Merriam-Webster.com Dictionary, Merriam-Webster</i>, https://www.merriam-webster.com/dictionary/extension (Oct. 30, 2023)	
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